

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Talc Claimants (the “**TCC**” or the “**Committee**”) in the above-captioned case of LTL Management, LLC (the “**Debtor**” or “**LTL**”), by and through the Committee’s proposed counsel, having filed substantially contemporaneously with this Application the *Motion of the Official Committee of Talc Claimants to Terminate the Debtor’s Exclusive Period Pursuant to 11 U.S.C. § 1121(d)(1)* (the “**Motion**”²), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. **Based on the Court’s remarks during a May 16, 2023 hearing (discussed below), the Committee respectfully requests that the hearing on the Motion be scheduled for June 13, 2023 at 10:00 a.m.**

2. During a hearing held on May 16, 2023, the Court invited the Committee to file a motion to pursue a competing plan by June 5, 2023 to be heard on June 13, 2023 along with the

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² **THE TCC HAS ASSERTED AND CONTINUES TO ASSERT THAT THE DEBTOR’S CHAPTER 11 CASE WAS FILED IN BAD FAITH AND SHOULD BE DISMISSED. THIS MATTER IS PENDING BEFORE THIS COURT. ANY CHAPTER 11 PLAN THAT MAYBE PROPOSED BY THE TCC ASSUMES, ARGUENDO, THAT THE DEBTOR’S CHAPTER 11 CASE IS NOT DISMISSED AS A BAD FAITH FILING. THE TCC RESERVES ALL RIGHTS TO CONTINUE TO ARGUE THAT DISMISSAL IS REQUIRED UNDER THE BANKRUPTCY CODE.**

Debtor's motion for scheduling a hearing to consider its proposed disclosure statement. *See* May 16, 2023 Tr. (pg. 39, ln. 20 to pg. 40, ln. 21). Accordingly, the TCC's Motion is the motion anticipated by the Court's May 16th remarks and this Application is consistent with those remarks.

3. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: June 5, 2023

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz

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